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February 3, 2025

VIA ECF

Honorable Arun Subramanian
United States District Court
Southern District of New York
500 Pearl Street
New York, NY 10007

Re: Doe v. Gov't of the U.S. Virgin Islands, et al., No. 1:23-cv-10301-AS

Dear Judge Subramanian:

We are the attorneys for Stacey Plaskett. We write to correct an error in Plaintiffs' submission to the Court on Friday (ECF No. 197). In the letter, Plaintiffs claim to "have produced emails from Jeffrey Epstein to Plaintiff Jane Doe 3 confirming a scheduled phone call with her and Stacey Plaskett, as well as an in person [*sic*] meeting confirmed by Epstein to take place between defendant Stacey Plaskett and Jane Doe 3 in New York." The actual documents say no such thing and cannot reasonably be read to support such a statement. We have requested that Plaintiffs correct their misstatements, but they have refused.

First, neither document was from Epstein; both were from his assistant, Lesley Groff.

Second, neither confirmed any meeting or call between Doe 3 and Ms. Plaskett. Exhibit A is an email from Groff *to Epstein* setting forth a daily schedule (presumably his), including a call with Ms. Plaskett. Doe 3 is merely copied. In Exhibit B, Groff sends a daily schedule (again, presumably Epstein's) to Doe 3. The schedule includes reference to a "reception in honor of Stacey Plaskett." Even under the questionable proposition that Epstein's assistant was sending Doe 3 a copy of Doe 3's schedule, Plaintiffs cannot credibly claim that a "reception in honor of" amounts to the confirmed one-on-one "in-person meeting" implied by Plaintiffs' letter.

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These misrepresentations are not *de minimis* or harmless. Ms. Plaskett is a high-profile politician. Baseless allegations that she had multiple, one-on-one, contemporaneous instances of contact with one of Epstein's purported victims is defamatory and could result in substantial harm. At best, this is an improper attempt to supplement Plaintiffs' opposition to motions to dismiss. At worst, it is an attempt to put public pressure on Ms. Plaskett as a tactic to influence her legal strategy. Neither are appropriate.

We are sorry to have to put this on the Court's busy docket but feel compelled to correct the public record and the record before the Court.

We thank the Court for its courtesy and attention to this matter.

Respectfully submitted,

/s/ Eric R. Breslin
Eric R. Breslin

cc: All counsel of record (via ECF)